



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

SEP 10 2014

OFFICE OF  
SOLID WASTE AND  
EMERGENCY RESPONSE

**MEMORANDUM**

SUBJECT: Recusal

FROM: Barry N. Breen  
Principal Deputy Assistant Administrator

TO: Mathy Stanislaus  
Assistant Administrator

Nitin Natarajan  
Deputy Assistant Administrator

OSWER Office Directors

Recently, my spouse's cousin, who is an attorney, has received a new assignment with the Legal Group of ARCADIS U.S., Inc. The new assignment is to serve as the ARCADIS U.S. Environment Division's Legal Counsel.

Pursuant to 5 C.F.R. §2635.502, I cannot participate in any particular matter involving specific parties that would cause a reasonable person with knowledge of the relevant facts to question my ability to carry out impartially my official duties with respect to my cousin, who is employed as Legal Counsel for ARCADIS, a design and consultancy firm that works in the environmental field. I am recusing myself from participating personally and substantially in any specific party matter in which my cousin is representing ARCADIS or in which the ARCADIS Legal team is itself involved to avoid even the appearance of a loss of impartiality. I have consulted with agency ethics officials and understand that I need not recuse from those matters in which ARCADIS is simply providing engineering support; instead, my ethics concern hinges on the participation of my cousin and, as a prudential matter, her legal office. Any discussion, briefing, communication or meeting related to these matters should be directed to the Assistant Administrator and/or the applicable OSWER Office Director, as appropriate, without my participation.

cc: Justina Fugh  
Johnsie Webster



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

APR 7 2003

OFFICE OF  
SOLID WASTE AND EMERGENCY  
RESPONSE

To: OSWER Office and Staff Directors  
Staff Members, Immediate Office of the Assistant Administrator, OSWER

From: Barry Breen  
Principal Deputy Assistant Administrator

Subject: Recusal from Spring Valley Site in Northwest Washington, D.C.

This memorandum is to renew my recusal from taking official action with respect to any matter concerning the Spring Valley Site in Northwest Washington, D.C. I originally recused myself from this matter in 1993 when contamination at this site first came to light.

I am an adjunct professor on a part-time schedule at the American University law school. According to press reports, American University is a party to some of the discussions, or proceedings regarding responsibility for the contamination.

If any substantial discussions pertaining to the Spring Valley site arise, that would otherwise call for my participation, please refer all matters relating to the Spring Valley Site to other appropriate officials without my knowledge.

cc: Marianne Horinko, OSWER  
Tom Dunne, OSWER  
Gayle Rice, OSWER  
Laurie May, OSWER  
Tom Voltaggio, Region III  
Abe Ferdas, Region III  
Phyllis Harris, OECA  
Steve Shimberg, OECA  
Susan Bromm, OECA  
Ken Wernick, OGC



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1445 ROSS AVENUE, SUITE 1200

DALLAS, TEXAS 75202 - 2733

April 21, 2017

**MEMORANDUM**

**SUBJECT:** Recusal Statement

**FROM:** David Gray   
Acting Deputy Regional Administrator

**TO:** Samuel Coleman  
Acting Regional Administrator

As the Acting Deputy Regional Administrator, I want to ensure that I take the appropriate steps to avoid any actual or perceived conflict of interest. As required by 18 U.S.C. § 208(a), I will not participate personally and substantially in any particular matter that has a direct and predictable effect on my financial interests or those of any other person whose interests are imputed to me. My imputed interests include my spouse, any minor children, or any general partner; any organization in which I serve as officer, director, trustee, general partner or employee; and any person or organization with which I am negotiating or have an arrangement concerning prospective employment.

I understand that this prohibition restricts me from participating in any particular matter that involves Home Depot as a specific party unless I first obtain a written waiver from the Office of General Counsel pursuant to § 208(b)(1), or qualify for a regulatory exemption, pursuant to § 208(b)(2). Any specific party matters involving Home Depot should be directed to you without my participation or knowledge.

I further understand that I am precluded from participating personally and substantially in any determination, request or recommendation that specially relates to or affects the salary or benefits of my spouse, [provide name]. Therefore, pursuant to 18 U.S.C. § 208 and 5 C.F.R. § 2635.502, I am recusing myself from participating in any award, promotion, or any other personnel or administrative matter that involves my spouse as a specific party. Any personnel or administrative matters involving my spouse should be directed to James McDonald, Assistant Regional Administrator, without my participation or knowledge.

cc: Jim Payne, Regional Counsel  
Ben Harrison, Deputy Regional Counsel  
Justina Fugh, Senior Counsel for Ethics





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6


1445 ROSS AVENUE, SUITE 1200  
DALLAS, TEXAS 75202 - 2733

Office of the Regional Administrator

APR 24 2018

MEMORANDUM

SUBJECT: Recusal Statement

FROM: David Gray   
Acting Deputy Regional Administrator

TO: Ann L. Idsal  
Regional Administrator

As the Acting Deputy Regional Administrator, I want to ensure that I take the appropriate steps to avoid any actual or perceived conflict of interest. As required by 18 U.S.C. § 208(a), I will not participate personally and substantially in any particular matter that has a direct and predictable effect on my financial interests or those of any other person whose interests are imputed to me. My imputed interests include my spouse, any minor children, or any general partner; any organization in which I serve as officer, director, trustee, general partner or employee; and any person or organization with which I am negotiating or have an arrangement concerning prospective employment.

I further understand that I am precluded from participating personally and substantially in any determination, request or recommendation that specially relates to or affects the salary or benefits of my spouse, Rob Lawrence. Therefore, pursuant to 18 U.S.C. § 208 and 5 C.F.R. § 2635.502, I am recusing myself from participating in any award, promotion, or any other personnel or administrative matter that involves my spouse as a specific party. Any personnel or administrative matters involving my spouse should be directed to James McDonald, Assistant Regional Administrator, without my participation or knowledge.

cc: Jim Payne, Regional Counsel  
Ben Harrison, Deputy Regional  
Counsel  
Justina Fugh, Senior Counsel  
for Ethics



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF  
SOLID WASTE AND  
EMERGENCY RESPONSE

NOW THE  
OFFICE OF LAND AND  
EMERGENCY MANAGEMENT

**MEMORANDUM**

**SUBJECT:** Recusal from ICF

**FROM:** Barry N. Breen  
Principal Deputy Assistant Administrator

*[Signature]* 1/12/17

**TO:** Mathy Stanislaus  
Assistant Administrator

Nitin Natarajan  
Deputy Assistant Administrator

OLEM Office Directors

Recently, I learned that a relative of mine works at ICF. As a result, and to avoid conflict of interest or loss of impartiality, or the appearance of it, I am recusing myself from participation (personally and substantially) in any EPA matter which involves this entity.

Any discussion, briefing, communication or meeting related to matters associated with ICF should be directed to an alternate manager, as appropriate, without my participation.

cc: Justina Fugh  
Susan Smith  
Kecia Thornton